

FEDERAL BUREAU OF INVESTIGATION
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FOI/PA# 1361968-0

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6. PRIVILEGES AVAILABLE TO A FORMER MEMBER OF THE SENATE

Some of the privileges afforded to a former Member of the Senate are derived from statutory law and the Senate Rules, but most are traditional courtesies. The following list was compiled by the Senate Library in consultation with the Congressional Research Service, the Office of the Secretary of the Senate, the Office of the Sergeant at Arms, the Office of the Architect of the Capitol, the Joint Committee on Printing, and the Senate Committee on Rules and Administration.

- 1311
- ST saw NOV 29 1984
- (1) Floor privileges in the Senate (found in Senate Rule XXIII).
 - (2) Permanent Senate ID from the Senate Sergeant at Arms.
 - (3) Use of the Senators' dining rooms.
 - (4) Outpatient care at the Capitol Physician's Office on a space available basis. Prescription drugs are also available.
 - (5) Parking at the Capitol complex. While no parking permits are issued, arrangements can usually be made by calling the Office of the Sergeant at Arms.
 - (6) Use of the Congressional Research Service. Borrowing privileges at the Library of Congress are available provided the former Member's account is clear. However, the Library of Congress is unable to make deliveries to former Members.
 - (7) Use of and borrowing privileges at the Senate Library.
 - (8) Documents from the Senate Document Room upon the personal request of the former Member.
 - (9) Services of the Disbursing Office, including check cashing, purchase of traveler's checks, and assistance regarding retirement and other benefits.
 - (10) Use of the Credit Union.
 - (11) Purchasing privileges at the Stationery Room.
 - (12) Use of the Senators' gymnasium.
 - (13) A subscription to the Congressional Record (44 USC section 906). Requests for the Congressional Record should be made in writing to: Superintendent of Documents, U. S. Government Printing Office, Washington, D.C. 20402.
 - (14) A copy of the Congressional Directory is usually available from the Joint Committee on Printing.
 - (15) Use of the Senate barbershops.

3. FRANKING PRIVILEGE

A Senator is authorized to use the mailing frank for a period of 90 days immediately following the date on which the office is vacated for matters of official business related to the closing of the Senator's office.

A surviving spouse (or if there is no surviving spouse, a member of the immediate family of the Member designated by the Secretary of the Senate in accordance with the rules and procedures established by the Secretary) may use the frank for not more than 180 days after the death of a Senator for non-political correspondence relating to the death of the Senator.

Additional uses of the mailing frank, involving public documents printed by Congress and Department of Agriculture reports and seeds, are authorized for certain periods following the expiration of a Senator's term of office. Appendix C lists the various uses of the mailing frank, applicable sections of the U. S. Code, and periods during which the frank may be used. For additional information, see the Select Committee on Ethics (224-2981) "Regulations governing THE USE OF THE MAILING FRANK by Members and Officers of the United States Senate."

4. THE POST OFFICE AND THE MAIL

Regular mail delivery by the Senate Post Office will terminate on the last day of the Senator's service. The standard practice of the Senate Post Office is to forward all mail to the Senator's forwarding address until January 31 of the year following the Senator's departure. After one year, everything is returned to sender by the Senate Post Office. It is recommended that the Senator's staff make every effort to remove the Senator's name from mass mailed materials prior to departure by contacting the Senate Post Office (224-5353). If the Senator's staff does not remove the Senator's name from this mass mail material, the Senate Post Office will remove the Senator's name as of February 1st of the year following the Senator's departure.

United States Senate

OFFICE OF THE SERGEANT AT ARMS

ROOM S-321, THE CAPITOL BUILDING

WASHINGTON, D.C. 20510

November 14, 1984

F.Y.I.
WB

NOV 29 1984

Honorable John Tower
179 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Tower:

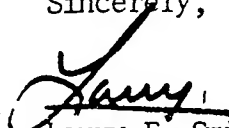
With your pending retirement from the Senate, I know you have much work to do in closing out your Senate office. I hope you will call on me if this office can do anything to assist you in this effort.

Even though I am sure your staff has already attended to most administrative matters relating to the closing of your office, I am enclosing for their reference a checklist of items relating to services provided by the Office of Sergeant at Arms.

Please let us know if we can do anything for you.

Best personal regards,

Sincerely,


Larry E. Smith
Sergeant at Arms

LES:pam

Closing Office Checklist

- 1) Notification of Secretary of the Senate and Sergeant at Arms of intent to close offices. Include the names of your staff designated as coordinators as well as the dates set for closing.
- 2) Notification of Sergeant at Arms, GSA, and/or leasor of intent to close home offices, 30 days in advance.
- 3) Obligation of funds cannot be incurred after the last day of a Senator's service.
- 4) Recording & Photographic Accounts should be reviewed and cleared prior to Senator's last day.
- 5) Termination of telephone service: contact Sergeant at Arms regarding Washington, D. C. office phones; GSA regarding home office phones; and local commercial telephone company regarding any commercial phone service in home offices. Telecommunication equipment and lines associated with computer systems and services are the responsibility of the Sergeant at Arms.
- 6) Physical inventories will be performed by the Service Department for equipment and furniture located in Washington, D. C. Sergeant at Arms will make arrangements for inventories to be taken in home state offices.
- 7) Negotiations with Sergeant at Arms about any stolen, damaged, or lost equipment.
- 8) Return Senate Identification cards to Sergeant at Arms
- 9) Termination of employment and salary of staff after the close of business on January 2.
- 10) Placement Office is available for reemployment services.
- 11) Return of reproductions of paintings and prints to the National Gallery of Art (phone 842-6454 Congressional Loans)
- 12) Return of maps of states and counties and any borrowed books to the Library of Congress (Senate Reference Center 4-3550)
- 13) Return any borrowed books or magazines to Senate Library (4-7106)
- 14) Return unabridged dictionary and stands to Disbursing Office.
- 15) Senators have the option to purchase their chamber chairs for the amount of \$150.00

- 16) Senators have the option to purchase equipment or furniture from one state office. Contact Sergeant at Arms State Office Liaison Office 4-5409
- 17) Senate Post office terminates regular mail delivery on last day of Senator's service. Post office will forward all mail to Senator's forwarding address until 1/31 of year following Senator's departure.
- 18) Remove Senator's name from mass mailed materials prior to departure.
- 19) Senators wishing to transfer computer and micrographic files to another Senator must notify the Sergeant at Arms in writing signed by both Senators.
- 20) Master microfilm of Senators' office files will be destroyed 90 days after a Senator's term unless Sergeant at Arms is notified otherwise.
- 21) Retired records can be disposed of by transferral to
 - 1) a designated library or educational institute, 2) a state archive or historical society or 3) a private residence
- 22) Franking privileges may be used to transfer files, papers, etc.

tile

SUMMONS

TO:

Jacket Number: DC-1403-86
_____: Plaintiff
vs.
_____: Defendant

You are hereby SUMMONED and required to file an answer to the complaint, which is herewith served upon you, at the office of the Clerk of this Court in Room 220, 451 Indiana Avenue, N.W., within twenty (20) days after service of this summons upon you, exclusive of the day of service, and to serve a copy of said answer upon the plaintiff's attorney, indicated below. If you fail to do so, action may be taken against you for the relief demanded in the complaint. It is recommended that you seek the advice of an attorney to assist you in this case.

PLAINTIFF'S ATTORNEY:

Name: _____	Address: _____ Washington, D.C. 20006
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Witness, the Honorable Chief Judge of the Superior Court of the District of Columbia and seal of said Court

SPECIAL PROCESS SERVED
SEAL

SPECIAL PROCESS SERVED

Clerk of the Superior Court
of the District of Columbia

COMPLAINT

Date: _____ By: _____ Deputy Clerk

FOR USE OF U.S. MARSHAL OR PROCESS SERVER

I hereby certify and return that I served the within Summons and Complaint upon	
Name: _____	
Address: _____	
on the _____ day of _____, 19____ at _____ AM/PM	
<input type="checkbox"/> Personally.	
<input type="checkbox"/> Individual served is a person of suitable age and discretion then abiding in the defendant's usual place of abode.	
<input type="checkbox"/> I further certify that defendant is not a resident of the District of Columbia.	
<input type="checkbox"/> I hereby certify and return that after diligent investigation I am unable to serve the individual, company, corporation, etc., named above.	
Dates of Endeavor and/or Remarks: _____	Time: AM/PM _____

OFFICE OF THE U.S. MARSHAL
DISTRICT OF COLUMBIA

By: _____ Signature of Marshal Representative

PROCESS SERVER'S CERTIFICATION

I hereby certify that I am a competent person over eighteen years of age residing or maintaining a regular place of business in the District of Columbia with no interest in the subject matter of this suit nor am I a party thereto and that I have served this SUMMONS and COMPLAINT as indicated above.

Signature of Process Server: _____ Age: _____

Address: _____

Residence: _____

Subscribed and sworn to before me this _____ day of _____, 19____

Notary Public
District of Columbia

(Deputy Clerk)

161-20403-158

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Family Division
Domestic Relations Branch

Lilla Burt Cummings Tower
20 Kalorama Circle, N.W.
Washington, D.C.,

Plaintiff,

v.

John Goodwin Tower
3525 Turtle Creek Boulevard
Apartment 21B
Dallas, Texas,

Serve Washington Address:
2101 L Street, N.W.
Tenth Floor
Washington, D.C.,

Defendant.

DC1403-86

Civil Action No.

FILED
FAM. DIVISION
MAY 30 9 31 AM '86

COMPLAINT FOR ABSOLUTE DIVORCE
(Separation - Six Months)

1. Jurisdiction of this action is based on D.C. Code § 11-1101(1) (1981).
2. Plaintiff, Lilla Burt Cummings Tower, is an adult citizen of the United States and has been a bona fide resident of the District of Columbia for more than six months next preceding the commencement of this action.
3. Defendant, John Tower, is an adult citizen of the United States, and resides in Dallas, Texas, and Washington, D.C.
4. The parties were lawfully married to each other in Dallas, Texas, on May 29, 1977.
5. No children have been born of said marriage.
6. The parties have voluntarily lived separate and apart since on or about November 11, 1985, a period of more than six months next preceding the commencement of this action.

7. During the period of the aforesaid separation, plaintiff actually resided at 20 Kalorama Circle, N.W., Washington, D.C.

8. Defendant is self-employed and is able to contribute to the support and maintenance of plaintiff. Plaintiff is unemployed and is in need of payments from defendant for her support.

9. Plaintiff is the owner of certain real property in the District of Columbia, located at 20 Kalorama Circle, N.W., Washington, D.C., as well as other real property in the District of Columbia, all of which is her sole and separate property.

10. During the marriage defendant acquired, other than by gift, bequest, devise or descent, certain business and other marital property in his own name, and the parties are the owners of certain community property.

11. Plaintiff separately owns certain items of personal property, and defendant separately owns certain items of personal property.

WHEREFORE, plaintiff prays:

1. That she be granted an absolute divorce from defendant on the ground of voluntary separation from defendant without cohabitation, for six months.

2. That defendant be required to pay to plaintiff reasonable sums for her support and maintenance.

3. That the court declare plaintiff to be the sole owner of the real property located at 20 Kalorama Circle, N.W., Washington, D.C., and the other real property in the District of Columbia which is her sole and separate property.

4. That defendant's business and other marital property including the community property of the parties be equitably divided between the parties, pursuant to D.C. Code § 16-9101(b).

5. That each party retain ownership of certain items of personal property which he or she owns separately.

6. That plaintiff be awarded counsel fees and other costs of this action.

7. For such other and further relief as the nature of the case may require, and as the court may deem just and proper.



Lilla Burt Cummings Tower

Subscribed and sworn to before me this 30th day
of May, 1986.


Notary Public

My commission expires: 2/29/88

WILLIAMS & CONNOLLY

By 
David Povich
839 17th Street, N.W.
Washington, D.C. 20006
(202) 331-5071

Attorney for Plaintiff

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Family Division
Domestic Relations Branch

LILLA BURT CUMMINGS TOWER,

Plaintiff,

v.

JOHN GOODWIN TOWER

Defendant.

Civil Action No. 1403-86

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT

TO: John Goodwin Tower
c/o Kenneth M. Lyons
Dickstein, Shapiro & Morin
2101 L Street, N.W.
Washington, D.C. 20037
Counsel for Defendant

The following are served upon you pursuant to Rule 33 of the Superior Court of the District of Columbia. They are to be answered by you fully, in writing, under oath, within thirty (30) days of their receipt, unless by agreement or by court order such time is extended.

A. These interrogatories are continuing in character so as to require you to file supplemental answers at any time that you should obtain further or different information.

B. Where the name or identity of a person is requested, please state the full name, home address, business and position, business address, and home and business telephone numbers. Where the identity of a document is requested, please identify by date, description, author, from whom it was sent, to whom it was sent, and a general description as to its contents. State also the identity of the person who presently has custody of it.

C. Unless otherwise indicated, these interrogatories refer to the period from January 1, 1980 to date.

D. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party's agents, representatives, advisors and, unless privileged, his attorneys. When answer is made from knowledge of your agent, etc., state the name, address and title of the person supplying the information and making the affidavit, together with the source of his information.

E. The pronoun "you" refers to the party to whom these interrogatories are addressed and the person mentioned in clause (D).

F. "Document" means any writing or record of any type or description known to the Defendant, including, but not limited to, telephone message slips, telephone logs, telephone bills, agreements, memoranda, telegrams, telexes, cables, messages, notes, reports, forms, inter-office communications, interoffice communications, appointment books, appointment logs, desk calendars, diaries, ledgers, journals, logs, travel vouchers, lists, notebooks, computer print-outs, microfilm, microfiche, photographs, tape recordings, transcripts, affidavits, opinions, signed statements, summaries, notices, books, canceled checks, checks, check stubs, check ledgers, bank statements, cash receipts journal, articles, newspapers, charts, magazines, loan papers, notes receivable, ledgers, records, books of account, commercial paper, and all other documentary material including non-identical copies (whether different from the original because of any alteration, notes, comments or other material contained thereon or attached thereto or otherwise), and whether a draft or final version.

G. "Relating" means to make a statement about, refer to, discuss, describe, reflect, identify, deal with, consist of,

comprise, or in any way pertain in whole or in part, to the subject.

I. INTERROGATORIES

1. State your full name, your present residence(s), date of birth and social security number.

2. Please state each place where you have resided from January 1980, to date, and with respect to each, state the complete address by number, street, city, zip code, and if there was available to you a telephone at that address, the telephone number. State also the inclusive dates you resided at each and every residence, and the owner of said residence.

3. If you have been employed either by contract or otherwise at any time from January 1, 1980, to the present state the name, mailing address and telephone number of each employer, the date each employment was commenced and the date terminated, your job title, position, or, if under contract, the identification of same, the services you have performed or are to perform, the name, address and position of your immediate supervisor or agency of each position, and the gross and net money paid to you by each employer during the periods of employment, and any other benefits you may have received.

4. If you have received any income or money or thing of value from any source whatsoever which is not disclosed in your answer to Interrogatory 3 since January 1, 1980, identify the source, and answer the questions in Interrogatory 3, and, in addition state the amount received in each year, month or week. With respect to employment and sources of income, money, or thing of value identified in Interrogatories 3 and 4, state whether there are any payments or a thing of value due from this source at the present time or in the future, and if so, state what is

due, when it is due, and the name and address of the party from whom it is due.

5. Have you received any money from any source whatsoever which is not disclosed in your answer to Interrogatories 3 and 4 since January 1, 1980? If so, for each source, state the source of such income, the amount received in each year, month or week, and whether there is anything due from this source at the present time, and, if so, state what is due and when, and the name and address of the party from whom it is due.

6. If you have received any money or thing of value in connection or with respect to your campaigns for United States Senator from the State of Texas or for services rendered as consultant employed or appointed by the United States from January 1, 1980, to date, for each source, state the source, the amount or thing of value received in each year, month or week, and whether there are any payments due from this source at the present time or in the future, and if so, state the amount due and the name and address of the party from whom it is due.

7. With respect to Interrogatory 6 did you receive any funds for your campaigns entitled Tower Senate Club, Texans for Tower, or the like, or other similar campaign or slush funds which were required to be reported with the Federal Election Committee, and/or the Secretary of State in Austin, Texas, and if so, identify with specificity the name of each and every fund, the period it was in existence, the funds which were received for the years 1980 to date, the balances for each and every fund as of August 1983, or the date you announced your retirement from the Senate, and the balances each and every year thereafter for the dates you were required to report to any federal or state authority, the expenditures of those funds from January, 1983, to date; also state the amount of the funds, if any, returned to

contributors and if so, the amounts and the dates said funds were returned and to whom, and identify with specificity all records for each year in question which in any way relate to the receipt of the funds and their expenditure or their return during the period January, 1983 to date.

8. Identify all real or personal property in which you have an interest, describing the nature of any such interests, and list any and all documents that relate in any way to your interest or its value. Describe the property with particularity, give its value and the basis for the determination.

9. If at any time during the last five years you made or caused to be made any financial statement or resume of your financial worth or list of assets, state the purpose for which it was made; identify each person, institution, federal or state agency, company or group to which the statement or resume was provided; and identify the document with particularity.

10. Identify and describe with particularity each and every source from which you expect to or will receive income, money or thing of value in the future.

11. With respect to every source of income, money or thing of value described in response to Interrogatory 10, describe with particularity the income, money or thing of value which you expect to or will receive; state the amounts of income, money or value of things you expect to or will receive; and identify each and every document that relates to your expectation or entitlement to receive or derive such income or things of value from each such source.

12. Identify any agent or representative which you may have or any person who has booked or arranged for you to give a speech or lecture or to write a book, magazine or newspaper article, and with respect to each agent or representative, identify the contracts or arrangements entered into by you or

them for or on your behalf, and with respect to each give the date, the location, the nature of the services you are to render, the sums to be received by you, when they were to be received, and in what form.

13. List each person, company, or organization or governmental body, its address, telephone number, and the principal or agent with whom you or someone on your behalf has dealt with respect to any consultancies of any kind, and any business venture or activity in which you have engaged or have been asked to engage in now or in the future, and for each describe with particularity the income, money or thing of value which you have received, expect to receive or will or may receive; state the amounts of income, money or value of things which you have received with respect to each or will or may receive; for each describe the services which you have been asked to perform or will or may perform, and identify each and every document that relates thereto or contains information relating thereto.

14. Describe with particularity all retirement benefits, including Civil Service Retirement and Supplements thereto, IRA or KEOGH plans or the like, or any type of savings plan or retirement benefit plan in which you have an interest, and with respect to each state the value of such interest; identify the pension, firm, and/or other entity that manages, maintains, or holds such account; and identify each and every document that relates to the establishment, management, maintenance, and value of each such benefit, etc. during the period of your interest in it, the amounts you are currently receiving if any, the withdrawals if any you have made since January, 1983, to date, and with respect to each of said withdrawals the amounts and dates thereof.

15. List all life insurance policies issued in your

name or for which you are named beneficiary. For each such policy, state the name and address of the insurer; provide the policy number and the face amount of each policy; the cash value for each year the policy is held; the amount of the yearly premium required for each; and the name and address of the beneficiary of each policy.

16. If you have made any withdrawals of any funds, including retirement funds, assets, bonds, or other things of value in excess of \$500.00 from any depository since January 1, 1983, state when and why each withdrawal was made, the amount of each withdrawal, and where the asset or property so withdrawn was placed, and how it was used.

17. Identify all charge accounts and credit cards that are in your name or which you have used since January 1, 1983, the number of each such account or credit card, the amount of the line of credit extended to you, and your current account balance, and identify all documents relating to these accounts or credit cards including, but not limited to bills, receipts and monthly statements.

18. What is the amount of cash you have on hand and in financial institutions as of the date of your answer to these Interrogatories?

19. Complete in its entirety the expenses and income form attached hereto as "Exhibit A," setting forth your income, and expenses, and provide a complete detailed listing of all assets and liabilities.

20. Are you the beneficiary of any estate or trust presently in existence, probate, or in the process of being administered? If so, state the name and relationship to you of the donor, grantor, testator, and/or trustee, administrator, or executor, and identify the instrument that creates the interest in you and the income, property or interest received or to be

received.

21. Do you have any reasonable expectation of receiving an inheritance? If so, describe with particularity the source, nature and amount of the inheritance and identify any documents relating to such inheritance.

22. Have you had, since January 1, 1983, and do you now have, any savings, checking, money market or other account or a safety deposit box in your name solely or jointly with another, with any bank or financial institution, company or firm. If so, state the address and name of the bank or financial institution, the type of account, the name(s) on the account, the persons(s) authorized to draw on the account, the date the account was opened, the date the account was closed, the account number, the balance of the account on April 1, June 30, September 30 and December 31 of each year you had the account, and the amount of the present balance, if any, or the amount of the last balance before the account was closed.

23. Is any person holding funds for you to which you are or will become entitled? If yes, state the name and address of each person holding such funds and the amount held by each, and the reason therefor.

24. Identify all property and assets of every nature and description which you sold, transferred, conveyed or otherwise disposed of from January 1, 1983, to the present, furnishing as to each item the value thereof as of the date of acquisition, the date of disposition, and the consideration received, and identify all documents relating thereto.

25. Identify each and every person, firm, company, corporation, government agency, or campaign or other fund which has paid any business or personal expense, or expenses of any kind for you or on your behalf for the period January 1, 1983, to date, and with respect to each identify the payor, the amount,

any document supporting the expense, and the person or persons who have copies of all documents or supporting documents relating thereto.

26. Identify with particularity the Witchita Pot, how it was acquired, from whom, for what sum or sums, the sources of the money used to purchase it, any payments made with respect thereto, each and every financial transaction of yours relating thereto, its value in in each of the years you had an interest therein, your present interest, any sums which you received, from whom, when, and the present status of this asset. In addition, identify any agreement or understanding reached between you and your Wife with respect to this asset and the current status thereof.

27. Identify with particularity the Blow-out Preventor, how it was acquired, from whom, for what sums or sums, the sources of the money used to purchase it, any payments made with respect thereto, each and every financial transaction of yours relating thereto, its value in each of the years you had an interest therein, your present interest, any sums which you received, from whom, and the present status of this asset. In addition, identify any agreement or understanding reached between you and your Wife with respect to this asset and the current status thereof.

28. Have you and your Wife at any time entered into a prenuptial agreement. If so state the date(s) the agreement was entered into; any date(s) thereafter it was affirmed; the terms of the agreement; whether there is any writing of any kind evidencing said agreement and if so, identify it and the location thereof and the person(s) who have custody thereof. State whether the agreement remains in effect, and if not, state with particularity the reason it is no longer in effect. If there was an agreement, identify those assets of your Wife which, under the

agreement, are her sole and separate property, and those assets which are your sole and separate property, and for each asset state the present value thereof and the basis for your valuation.

29. Please identify by name, address and telephone number the person or persons who presently have copies of any documents relating to your income and expenses both business and personal, and your assets and liabilities for each of the years 1980 to date.

30. Identify any current notes or financial obligations of yours and with respect to each describe them with particularity setting forth the principle amounts due, the terms of payments, the interest rates, and whether payments have been suspended, forgiven and, if so, when and in what amounts, all with respect to the period January 1, 1980, to date.

31. Please set forth with particularity whether you and your Wife are participants in the Federal Employee Health Benefit Program and whether you have elected joint and survivor annuity benefits which entitle the Wife to continue survivor benefits for life if she survives you, and to health benefits so long as the Husband is living. In addition, identify all documents relating to said Program and state whether the Wife remains the sole eligible survivor to receive survivor benefits upon your death and whether you have elected the maximum survivor benefits for her. State whether the benefits of this plan for the Wife have been reduced since January 1, 1980, and if so, at whose instruction and in what specific manner, and was it done so with the written consent of the Wife.

32. State whether you are now or have been entitled to Civil Service Annuity and Health Benefits under the Civil Service Retirement Benefit Plan and if so state the sums which you have received for each year you were entitled to or did receive the sums, for the period January 1, 1980 to date, whether any

withdrawals have been made and if so the amounts and dates thereof, whether the benefits received include sums for the State Department supplement both with respect to the retirement and survivors annuity, and whether any elections have been made or actions taken which in any way affect the maximum amount which the Wife may otherwise be entitled to receive under said Retirement Plan. Identify all documents relating thereto.

33. Identify the person or persons who have copies of those documents containing or in any manner relating to telephone toll charges made by you for business or personal reasons for the period January 1, 1983, to date either in the United States or abroad, including but not limited to telephone toll charges incurred for personal reasons for which you reimbursed any person, business or governmental entity.

34. List the hotels in which you have stayed for one or more nights either in this country or abroad for the period January 1, 1983, to date, the reason for the stay, the inclusive dates, the charges which were incurred including but not limited to restaurant, bar and telephone charges. Identify the women with whom you had dinner, drinks or entertained, or with whom you met and the women with whom you spent the night or any portion thereof. In addition, identify each and every occasion during the period January 1, 1983, to date where you were present with or in the company of Mrs. Estil (Dottie) Heiser (Heyser) either in this country and abroad, and on each occasion identify the location, the hotel, facility, guest home, or residence, the inclusive dates, time of day and/or night, the duration you were together, the precise location thereof, and the person(s) agency or business that paid the expenses during said period including those for travel, hotel, food, drink, and activities, and the amounts and dates thereof, and identify the supporting documents relating thereto.

35. State the reason with particularity for your trip to Geneva in May of 1986, and whether it was for business or pleasure. If for business, state the nature thereof, for whom it was conducted, the compensation received, the entity which paid the expenses, the amount of the expenses, whether you met with any women at your former residence in Geneva, and if so identify her, the reason for the meeting, and the circumstances thereof.

36. State the reason with particularity for your trip to London, England, in February of 1985, whether it was for business or pleasure if for business state the nature thereof, for whom it was conducted, the compensation received, the entity which paid the expenses, whether you met with any woman or women in London and if so identify her or them, the reason for the meeting, and the circumstances thereof.

37. List all telephone toll calls made by you from abroad during 1985 and 1986 to the United States collect, and identify the person called, the reason for the call, the telephone number, the date and duration of the call and the charges.

38. Identify any sums received by you in excess of \$5,000 during the period January 1, 1984, to date, and with respect to each identify the payor, the reason for the payment, the accounts to which the funds were deposited and the depository, and the expenditures which were made from said funds.

39. List the sums spent by you for the period January 1, 1983, to date for suits and shirts, and indicate from whom they were purchased, when they were purchased, the sums paid, the cost of each suit and shirt.

40. Identify the "media personality" in Dallas, Texas, whom you entertained, had dinner and drinks with, and with whom you spent evenings at any time during the period January 1, 1983, to date.

41. Identify each and every occasion from January 1, 1985, to date when you met with Darla, a former member of your household staff in Geneva.

42. List any medical expenses which you have incurred for any surgical operations performed on you during the period January 1, 1985, to date, and identify the surgical procedures, describe the surgery performed and the purpose thereof, state when and where it occurred, the doctor who performed the surgery and the total cost thereof.

43. Describe in particularity and identify your relationship with the law firm of Dickstein, Shapiro & Morin, the services you provide them, the compensation or thing of value which they provide you, the date the relationship began, and when it is scheduled to terminate.

44. Identify each and every arrangement which you may have had with any individual, partnership, firm or corporation or state or federal agency in which you provided services in return for something other than the payment of income, but which is or will be of value, for example, services, expenses, advice introductions, or the like, all for the period January 1, 1983, to date.

45. State the basis for your denial in paragraph 10 of your Answer that the parties are the owners of certain community property.

46. State with particularity the factual basis for your contention in your Motion for Leave to File Amended Answer and Counterclaim that the property rights and other rights of the parties are governed by the law of Texas, and state with particularity the defenses and grounds for relief available to you under the law of Texas which are not available to you under the law of the District of Columbia and further, the rights and grounds for relief available to the Plaintiff under the District

of Columbia law which are not available to the Plaintiff under Texas law.

47. Identify any witness you propose to call as an expert in these proceedings, and state the subject matter which he is to testify, the substance of the facts and opinions to which he is expected to testify, and a summary of the grounds for each opinion.

48. List each and every witness you intend to call at trial. Identify them by name, address, employment, position, home and business telephone number, and set forth with particularity the matters about which they are to testify and if their testimony relates to or concerns a document, identify same or to a conversation or activity of the Wife set forth the substance of the conversation or the activity with which their testimony is concerned. If their testimony concerns the property of the Husband, his assets liabilities, income or expenses, or his business or conduct, identify with particularity the substance of his or her testimony, and the documents relating thereto.

49. If there is any written or recorded statement of your Wife or notes of any conversation between you and your Wife or between any other person and your Wife pertaining to this cause of action, and which you intend to introduce at trial, identify each such written or recorded statement and conversation of your Wife. In addition, identify all other conversations between you and your Wife or any other person and your Wife which relates to this cause of action and which you intend to introduce at trial.

50. Set forth all details of each trip taken by you for business, vacation or other purposes from January 1, 1980, to date and as to each identify your companion or companions, the total cost including expenses for food, recreation, lodging expenses, and state by whom said expenses were paid.

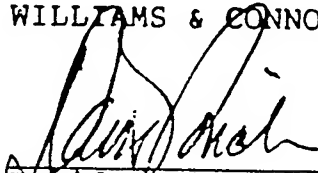
51. Set forth and itemize all monies spent by you directly or indirectly for the benefit of any female person to whom you are not related by blood or marriage, since January 1, 1980, to the present.

52. State whether you have had sexual relations with a woman other than your wife since your marriage to her, and if so, state the name and address of that person, and the date and location where they took place.

53. State the circumstances under which you and your wife separated.

Respectfully submitted,

WILLIAMS & CONNOLLY



David Povich
Bar No. 101081
839 17th Street, N.W.
Washington, D.C. 20006
(202) 331-5071

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of April, 1987, a copy of the foregoing was delivered by hand to Kenneth M. Lyons, Esquire, Dickstein, Shapiro & Morin, 2101 L Street, N.W., Washington, D.C. 20037.



David Povich

#51,52

WILLIAMS
& CONNOLLY
HOLDING
D.C. 20006

DE 202
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SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
FAMILY DIVISION
FINANCIAL STATEMENT

PLAINTIFF'S
EXHIBIT

Jacket No. _____

Date _____

NAME: _____ V. _____	
SOCIAL SECURITY NUMBER: _____	OCCUPATION: _____
NAME AND ADDRESS OF CURRENT EMPLOYER: _____	
I claim _____ exemptions for withholding tax purposes.	

INCOME INFORMATION*

1. Monthly gross wages	\$ _____
2. Less Mandatory Monthly Deductions:	
Federal Income Tax	\$ _____
State Income Tax	_____
Retirement:	
FICA	_____
Social Security	_____
Medical Insurance	_____
Other	_____
TOTAL	\$ _____
Monthly Net Wages	\$ _____
(Subtract Line 2 from line 1)	
Monthly income from all other sources (e.g., part-time or overtime wages, fees, rents, dividends, commissions, unemployment compensation, disability, social security, retirement, interest, bonuses, etc.)	\$ _____
Less Other Mandatory Monthly Deductions:	
Federal Income Tax	\$ _____
State Income Tax	_____
Retirement:	
FICA	_____
Social Security	_____
Medical Insurance	_____
Other	_____
TOTAL	\$ _____
Monthly Net Income from all other sources	\$ _____
(Subtract Line 5 from Line 4)	
Total Monthly Net Disposable Income	\$ _____
(Add Lines 3 and 6)	
Total Monthly Gross Income	\$ _____
(Add Lines 1 and 4)	

AVERAGE MONTHLY EXPENSES

	Wife/Husband	Child(ren)
Housing, etc.		
Rent/Mortgages	\$ _____	\$ _____
Utilities	_____	_____
Taxes	_____	_____
Food		
Groceries/Household Supplies	_____	_____
Meals Out	_____	_____
Automobile		
Payment	_____	_____
Gas/Oil	_____	_____
Repairs	_____	_____
Insurance	_____	_____
Tags	_____	_____
Life Insurance	_____	_____
(List beneficiaries)		
_____	_____	_____
_____	_____	_____
Health Insurance (not listed as income deduction)	_____	_____
School		
Tuition	_____	_____
Supplies/Fees	_____	_____
Child Care Expenses		
To allow for employment/education	_____	_____
To allow for recreation	_____	_____
Lessons (e.g. music, dance, art)	_____	_____
Allowance	_____	_____
Clothing/Uniforms	_____	_____
Dry Cleaning/Laundry	_____	_____
Medical Expenses (Unpaid by insurance)	_____	_____
Charitable Contributions	_____	_____
Recreation	_____	_____
Vacations	_____	_____
Miscellaneous:		
_____	_____	_____
_____	_____	_____
Periodic Payments Required on Bills:		
_____	_____	_____
_____	_____	_____
Total Monthly Expenses	_____	_____

SUMMARY

Total Monthly Net Disposable Income	\$ _____
Less Total Monthly Expenses	\$ _____
Difference:	\$ _____